

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS

JUN 17 2015

BY DAVID J. MALAND, CLERK  
DEPUTY

UNITED STATES OF AMERICA

§  
§  
§  
§  
§  
§

v.

CRIMINAL NO. 6:15CR 40  
MHS / JDL

LAQUAYLAN PATTERSON (01)

CHANEL COLLINS (02)

**INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

**Count One**

Violation: 18 U.S.C. §§ 2119(1), and 2  
(Carjacking and Aiding and Abetting)

On or about March 13, 2015, **Laquaylan Patterson** and **Chanel Collins**, aided and abetted by each other, did then and there intentionally and knowingly by force, violence and intimidation, with the intent to cause death and serious bodily harm, take a motor vehicle, to-wit: a 2005, Honda, Accord that had been transported, shipped, and received in interstate and foreign commerce, from an individual, in Smith County, Texas, in the Eastern District of Texas, in violation of 18 U.S.C. §§ 2119(1) and 18 U.S.C. § 2.

**Count Two**

Violation: 18 U.S.C. §§ 924(c) and 2  
(Use and carrying of a firearm during a  
crime of violence and Aiding and  
Abetting)

On or about March 13, 2015, in Smith County, Texas, in the Eastern District of Texas, **Laquaylan Patterson** and **Chanel Collins**, Defendants herein, aided and abetted by each other, did knowingly and intentionally use and carry, and brandish a firearm, to wit: a handgun, during and in relation to and possess in furtherance of a crime of violence for which they and each of them may be prosecuted in a court of the United States, that is carjacking, in violation of 18 U.S.C. §§ 2119(1), as described in Count One above, all in violation of 18 U.S.C. §§ 924(c)(1)(A) and 18 U.S.C. § 2.

**Count Three**

Violation: 18 U.S.C. §§ 2113(a), 2113(d)  
and 2 (Bank robbery and Aiding and  
Abetting)

On or about March 13, 2015, **Laquaylan Patterson** and **Chanel Collins**, aided and abetted by each other, did then and there intentionally and knowingly by force, violence and intimidation take from the person and presence of another, property, namely United States currency, belonging to and in the care, custody, control, management, and possession of the 1st National Bank of Gilmer, in Upshur County, Texas, in the Eastern District of Texas, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, did assault and put in jeopardy the life of another person by the use of dangerous weapons and devices, to wit: a handgun, in violation of 18 U.S.C. §§ 2113(a) and (d), and 18 U.S.C. § 2.

**Count Four**

Violation: 18 U.S.C. §§ 924(c) and 2  
(Use and carrying of a firearm during a  
crime of violence and Aiding and  
Abetting)

On or about March 13, 2015, in the Eastern District of Texas, **Laquaylan Patterson** and **Chanel Collins**, Defendants herein, aided and abetted by each other, did knowingly and intentionally use and carry, and brandish a firearm, to wit: a handgun, during and in relation to and possess in furtherance of a crime of violence for which they and each of them may be prosecuted in a court of the United States, that is bank robbery, in violation of 18 U.S.C. §§ 2113(a) and (d), as described in Count Three above, all in violation of 18 U.S.C. §§ 924(c)(1)(A) and 18 U.S.C. § 2.

**NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE**

Pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 924(d)(1) and 28 U.S.C. § 2461

As the result of committing one or more of the foregoing offenses, Defendant herein, shall forfeit to the United States of America pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 924(d)(1), and 28 U.S.C. § 2461, all property, real or personal, which constitutes or is derived from proceeds traceable to the aforementioned violation[s], including but not limited to the following:

**Cash Proceeds**

Approximately \$29,000.00 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is property constituting, or derived from, proceeds obtained directly or indirectly, as the result of the foregoing offenses alleged in this Indictment.

**Substitute Assets**

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- A. cannot be located upon the exercise of due diligence;
- B. has been transferred or sold to, or deposited with, a third party;
- C. has been placed beyond the jurisdiction of the court;
- D. has been substantially diminished in value; or
- E. Has been commingled with other property which cannot be subdivided without difficulty,

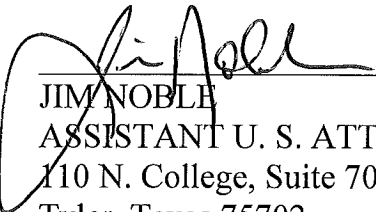
the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,

6-17-2015  
Date

BK  
Foreperson of the Grand Jury

JOHN M. BALES  
UNITED STATES ATTORNEY



JIM NOBLE  
ASSISTANT U. S. ATTORNEY  
110 N. College, Suite 700  
Tyler, Texas 75702  
(903) 590-1400  
(903) 590-1439 (facsimile)  
Texas State Bar No. 15050100  
James.Noble@usdoj.gov

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

UNITED STATES OF AMERICA	§	
	§	
V.	§	CRIMINAL NO. 6:15CR____
	§	
LAQUAYLAN PATTERSON (01)	§	
CHANEL COLLINS (02)	§	

**NOTICE OF PENALTY**

**Count One**

Violation:	Title 18, United States Code, §§ 2119(1) and 2 (Carjacking and Aiding and Abetting)
Penalty:	Imprisonment for not more than 15 years; a fine of not more than \$250,000.00; or both, a term of supervised release of not more than 5 years.
Special Assessment:	\$100

**Counts Two and Four**

Violation:	Title 18, United States Code, §§ 924(c) and 2 (Possession of a firearm during a crime of violence and Aiding and Abetting)
Penalty:	Imprisonment for a term of not less than 5 years, or not less than 7 years if the firearm is brandished, or not less than 10 years if the firearm is discharged, a fine of not more than \$250,000, or both. A term of supervised release of at least 5 years.

If a person is convicted of a second or subsequent violation of this section, imprisonment shall be for a term of not less than 25 years.

Any person convicted of this violation shall not be placed on probation and no term of imprisonment shall run concurrently with any other term of imprisonment.

Penalty Basis: Title 18, United States Code, Section 924(c)(1)(A)(I-iii)(B) and (D)

Special Assessment: \$100

**Count Three**

Violation: Title 18, United States Code, §§ 2113(a) and 2 (Bank robbery and Aiding and Abetting)

Penalty: Imprisonment for not more than 25 years; a fine of not more than \$250,000.00; or both, a term of supervised release of not more than 5 years.

Special Assessment: \$100